

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DEREK CARRIER and DORA
CARRIER, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

RAVI ZACHARIAS
INTERNATIONAL MINISTRIES,
INC., a 501(c)(3) Corporation; RZIM
PRODUCTIONS, INC., a Georgia
Non-Profit Corporation;
MARGARET ZACHARIAS, in her
Capacity as ADMINISTRATOR OF
THE ESTATE OF RAVI KUMAR
ZACHARIAS,

Defendants.

Case No.: 1:21-cv-03161-TWT

**DECLARATION OF BRADFORD
ROTHWELL SOHN IN SUPPORT
OF PLAINTIFFS' EMERGENCY
MOTION FOR EXPEDITED
DISCOVERY AND REQUEST FOR
EXPEDITED HEARING**

**Declaration of Bradford R. Sohn in Support of Plaintiffs' Emergency Motion
for Expedited Discovery and Request for Expedited Hearing**

I, Bradford Rothwell Sohn, do hereby declare, pursuant to 28 U.S.C. § 1746:

1. I am founder of the law firm The Brad Sohn Law Firm, PLLC and licensed to practice law in the State of Florida. I have sought admission *pro hac vice* to this Court through separate motion. Dkt. No. 12. The Clerk approved my motion for *pro hac vice* admission, ECF No. 12, on August 13, 2021. Except as expressly stated, I have personal knowledge of the facts set forth in this declaration.

2. I am co-counsel of record for Plaintiffs Derek and Dora Carrier. I submit this declaration in support of Plaintiffs' Emergency Motion for Expedited Discovery and Request for Expedited Hearing.

3. Plaintiffs bring this representative action against Defendants Ravi Zacharias International Ministries, Inc., RZIM Productions, Inc. (together, "RZIM"), and Margaret Zacharias, in her capacity as Administrator of the Estate of Ravi Kumar Zacharias ("Estate") (collectively, "Defendants"). Plaintiffs seek to prosecute this action on behalf of a putative donors-class of people bilked out of tens, if not hundreds of millions, of dollars. The Complaint (ECF No. 1) sets forth the factual basis for this matter and reflects significant investigative effort

Plaintiffs and their counsel engaged in prior to filing this lawsuit. That investigation continues.

4. In September 2020, RZIM hired the law firm Miller & Martin PLLC to conduct an independent investigation into allegations of the late Ravi Zacharias's sexual misconduct. Miller & Martin prepared a report ("Miller & Martin Report") detailing the results of its independent investigation. What I believe to be a true and correct copy of the Miller & Martin Report is attached hereto as Exhibit A.¹ That report confirmed the improper use of RZIM funds for purposes other than the ministry, including to invest in massage therapy spas and for the benefit of four women who were Zacharias's massage therapists. RZIM published the Miller & Martin Report in February 2021, apologized for mishandling allegations of Zacharias's sexual misconduct, and did not deny anything featured in the Miller & Martin Report.²

¹ Lynsey M. Barron & William P. Eiselstein, Miller & Martin PLLC, Report of Independent Investigation into Sexual Misconduct of Ravi Zacharias (Feb. 9, 2021) <https://s3-us-west-2.amazonaws.com/rzimmedia.rzim.org/assets/downloads/Report-of-Investigation.pdf>

² *Open Letter from the International Board of Directors of RZIM on the Investigation of Ravi Zacharias*, RZIM, <https://www.rzim.org/read/rzim-updates/board-statement> (last visited Aug. 12, 201).

5. Plaintiffs' counsel thoroughly reviewed available financial disclosures for RZIM. Those financial disclosures included Form 990 information filings that RZIM submitted to the IRS from 2001 to 2015. These Form 990s indicate that RZIM raised nearly \$18.85 million in 2011 with revenue generally increasing through the years until 2015 when RZIM raised \$25.7 million.³ Attached as Exhibit B is what I believe to be a true and correct copy of RZIM's last Form 990 for fiscal year 2014, which ended in 2015. Plaintiffs' counsel have been unable to locate additional Form 990s for RZIM after 2014, likely because they do not exist. In

³ Nonprofit Explorer: Ravi Zacharais International Ministries, PRO PUBLICA, <https://projects.propublica.org/nonprofits/organizations/133200719> (last visited Aug. 12, 2021).

2015, RZIM changed its status from a 501(c)(3) nonprofit to a church or association of churches.⁴ The IRS does not require churches to file Form 990s.⁵

6. MinistryWatch is “an independent donor advocate facilitating the information needs of donors,” which “provides information on organizations alleging to be charitable and its key leadership in order to identify materially misleading behavior, or wasteful spending practices.”⁶ MinistryWatch gives RZIM a “C”

⁴ Sarah Pulliam Bailey, *Major evangelical nonprofits are trying a new strategy with the IRS that allows them to hide their salaries*, THE WASHINGTON POST, (Jan 17, 2020), <https://www.washingtonpost.com/religion/2020/01/17/major-evangelical-nonprofits-are-trying-new-strategy-with-irs-that-allows-them-hide-their-salaries/>; Julie Roys, *Opinion: New Ravi Zacharias Allegations Highlight Secrecy, Cover-Up & Questionable Practices at RZIM*, The Roys Report, (Oct. 12, 2020, 3:47 PM), <https://julieroys.com/ravi-zacharias-allegations-highlight-secrecy-cover-up-at-rzim/>; Julie Roys, *Are Focus on the Family, BGEA & RZIM Churches? And Should They Be Exempt From Reporting Salaries of Executives?* THE ROYS REPORT, (Jan 21, 2020, 3:48 PM). <https://julieroys.com/are-focus-on-the-family-bgea-rzim-churches-and-should-they-be-exempt-from-reporting-salaries-of-executives/>.

⁵ Filing Requirements, Charities and Nonprofits, Exempt Organization Types, Churches and Religious Organizations, IRS, <https://www.irs.gov/charities-nonprofits/churches-religious-organizations/filing-requirements> (last visited August 12, 2021) (stating “some church-affiliated organizations . . . are excepted from filing” a Form 990).

⁶ *About MinistryWatch*, MINISTRYWATCH, <https://ministrywatch.com/about/> (last visited Aug. 12, 2021).

transparency and accountability grade,⁷ presumably because it ceased completing and publicly filing Form 990s.⁸

7. MinistryWatch reports on RZIM's following net revenue and assets from 2015 through 2019:⁹

Net assets	2019	2018	2017	2016	2015
Without donor restrictions	\$35,917,636	\$32,390,629	\$30,664,325	\$23,837,142	\$5,068,670
With donor restrictions	\$2,742,647	\$6,322,068	\$8,027,452	\$6,383,400	\$5,330,155
Net assets	\$38,660,283	\$38,712,697	\$38,691,777	\$30,220,542	\$10,398,825

Revenues and expenses

Revenue	2019	2018	2017	2016	2015
Total contributions	\$35,203,535	\$32,664,650	\$37,853,660	\$45,608,743	\$27,237,967
Program service revenue	\$860,686	\$1,037,457	\$772,125	\$1,212,148	\$943,821
Membership dues	\$0	\$0	\$0	\$0	\$0
Investment income	\$116,409	\$152,134	\$145,552	\$135,527	\$116,359
Other revenue	\$638,845	\$457,039	\$269,121	\$396,817	\$199,952
<i>Total other revenue</i>	<i>\$1,615,940</i>	<i>\$1,646,630</i>	<i>\$1,186,798</i>	<i>\$1,744,492</i>	<i>\$1,260,132</i>
Total revenue	\$36,819,475	\$34,311,280	\$39,040,458	\$47,353,235	\$28,498,099

⁷ Ravi Zacharias International Ministries/ RZIM, <https://briinstitute.com/mw/ministry.php?ein=133200719> (last visited Aug. 12, 2021).

⁸ *How MinistryWatch Arrives at a Transparency Grade*, MINISTRYWATCH, <https://ministrywatch.com/how-ministrywatch-arrives-at-a-transparency-grade/> (last visited Aug. 12, 2021).

⁹ Ravi Zacharias Ministries/RZIM, MINISTRY WATCH, <https://briinstitute.com/mw/ministry.php?ein=133200719> (last visited Aug. 12, 2021).

Unfortunately, however, our team could not locate any financial information for RZIM after 2019.

8. Our team’s pre-litigation investigation formed the basis for Plaintiffs’ Complaint but also raised very serious concerns about the use, and whereabouts, of Plaintiffs’ and the putative Class’s financial contributions.

9. Plaintiffs and their counsel have concerns that RZIM has continued to, or will continue to, use donor funds deceitfully and improperly, for purposes other than “reaching those around the globe with the Gospel”—the reason RZIM sought donations from Plaintiff and the putative Class.¹⁰ In 2017, Zacharias or RZIM paid \$250,000 to settle a claim brought by Lori Anne Thompson, who had accused Zacharias of sexual misconduct.¹¹ Zacharias concealed this payment from RZIM’s spokesperson, Ruth Malhotra.¹²

¹⁰ Ravi Zacharias, *Generous Giving, Part 1*, RZIM: LET MY PEOPLE THINK BROADCASTS, 01:16–01:38, (Nov. 30, 2019), <https://www.podchaser.com/podcasts/rzim-let-my-people-think-broad-216340/episodes/generous-giving-part-1-48828363>.

¹¹ Bob Smietana, *She wanted to help Ravi Zacharias save the world but ended up defending an abuser*, RELIGION NEWS SERVICE (Aug. 13, 2021), <https://religionnews.com/2021/08/13/ruth-malhorta-wanted-to-help-save-the-world-instead-she-ended-up-defending-an-abuser-raavi-zacharias-alori-anne-thompson/>.

¹² *Id.*

10. RZIM’s board of directors, has “engaged victim-advocate Rachael Denhollander” to act as a “consultant,” who will educate and advise [RZIM’s] Board and senior leadership in understanding trauma and abuse as well as best-standards practices” and who will also “serve as a confidential liaison with survivors and to help guide the process of care, justice, and restitution for those who have been victimized.”¹³ In addition, RZIM has “engaged Guidepost Solutions, a management/compliance consulting firm . . . to conduct a thorough evaluation of RZIM, including its structures, culture, policies, processes, finances, and practices.”¹⁴ The RZIM board of directors intends Guidepost Solutions to assess RZIM for survivor care, a cultural assessment, and a policy assessment.¹⁵ Using donor funds to hire victim-advocate/consultant Rachel Denhollander and Guidepost Solutions as a management/compliance consulting firm is contrary to the donors’ intent in and purposes for giving to RZIM.

¹³ *Open Letter from the International Board of Directors of RZIM on the Investigation of Ravi Zacharias*, RZIM, <https://www.rzim.org/read/rzim-updates/board-statement> (last visited Aug. 12, 201).

¹⁴ *Id.*

¹⁵ *Id.*

11. In addition, RZIM announced in March 2021 that it would become a grant-making organization that supports, in part, “the prevention of and caring for victims of sexual abuse.”¹⁶ Using donor funds to become a grant-making organization dedicated in part to victims of sexual abuse is contrary to the donors’ intent in and purposes for giving to RZIM.

12. Furthermore, based on the information uncovered in Miller & Martin’s independent investigation and the lack of financial information since 2019, Plaintiffs have concerns that RZIM has moved, or will move, donor funds or donor-funded assets to other corporate entities, charities, or other ministries. Any such transfers and/or spending also would be contrary to the donors’ intent in and purposes for giving to RZIM.

13. Plaintiffs and their counsel have significant concerns that the Defendants may be actively attempting to move or hide their assets. Our team believes these assets are purely donor gifts because when Zacharias and other agents of RZIM raised funds for the ministry, they repeatedly stated that RZIM

¹⁶ Brandon Showalter, *RZIM cuts staff, will restructure as grant-making organization to support abuse victims*, THE CHRISTIAN POST, (March 22, 2021), <https://www.christianpost.com/news/rzim-cuts-staff-will-restructure-as-grant-making-organization.html>.

operates entirely on donor funding.¹⁷ In addition, MinistryWatch reports that RZIM was 95% to 97% reliant on donor contributions from 2015 through 2019.¹⁸

14. Given the circumstances and facts available to our team at this time, Plaintiffs' counsel are very concerned that millions of additional dollars may be leaving RZIM's bank accounts, other financial accounts, and books before Plaintiffs will be able to conduct discovery according to a regularly noticed schedule as set forth in the Federal Rules of Civil Procedure and Local Rules for the Northern District of Georgia. Plaintiffs and their counsel believe that the risk that RZIM will spend, move, grant, hide, or otherwise deplete its assets is heightened given the filing of the underlying putative class action.

15. For the foregoing reasons, Plaintiffs and the putative Class believe they have more than good cause to conduct expedited discovery to learn about the status, amounts, and location(s) of RZIM's funds sourced from donations the

¹⁷ See, e.g., Ravi Zacharias, *Generous Giving, Part 1*, RZIM: LET MY PEOPLE THINK BROADCASTS, 01:16–01:38, (Nov. 30, 2019), <https://www.podchaser.com/podcasts/rzim-let-my-people-think-broad-216340/episodes/generous-giving-part-1-48828363>.

¹⁸ Ravi Zacharias Ministries/RZIM, MINISTRY WATCH, <https://briinstitute.com/mw/ministry.php?ein=133200719> (last visited Aug. 12, 201).

putative Class made. As discussed, RZIM's account balances assets are coextensive with putative Class Members' donations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2021, in Miami, Florida.

A handwritten signature in black ink, appearing to read "Brad R. Sohn", written over a light gray rectangular background.

Bradford R. Sohn